

Fidis, Alexander

From: Adena Hodgins <adenahodgins@gmail.com>
Sent: Wednesday, October 08, 2014 7:23 AM
To: Bob Dunn; Fidis, Alexander
Subject: Stubblefield PO Box

Hello, In case there was going to be any further paper work sent to the Estate, I'm sending you this info. I have closed the PO Box for the Estate of Emory Stubblefield, but are having the mail sent to my address instead to save the cost. My address is: (b) (6)

Thanks, Adena Hodgins, P.R.

Fidis, Alexander

From: Adena Hodgins <adenahodgins@gmail.com>
Sent: Tuesday, June 03, 2014 12:37 PM
To: Fidis, Alexander; Bob Dunn
Subject: Escrow Contact

Categories: Follow up email

This is the contact at the Title Co. Tarrah Wasser, her e-mail is tarrah@land-title.com. Adena

Fidis, Alexander

From: Adena Hodgins <adenahodgins@gmail.com>
Sent: Tuesday, June 03, 2014 10:20 AM
To: Fidis, Alexander
Cc: bdunn@dunnandblack.com
Subject: Re: FW: Hodgins

Yes, every since the court date May 9, the only thing left for closing, is the lien release. For the speed of closing, you can send it to Land Title of Walla Walla, 33 E. Main St., Walla Walla, Wa. 99362. I'm not sure the escrow agent's name, but can get that to you. Then I can get copies for Mr. Dunn's records and the Estate from her. Thank you, Adena

On Tue, Jun 3, 2014 at 9:43 AM, Fidis, Alexander <Fidis.Alexander@epa.gov> wrote:

Hi Adena –

I revised the agreement with the correct dollar amount as described in your email last week. I received the signed page from Mr. Dunn's office yesterday and the agreement still needs to be reviewed here and signed before we can proceed with the lien release. I hadn't heard that the closing was waiting for this lien release; if that is the case please let me know and I'll see what I can do to speed things up. That said, it will take a while for the agreement to be finalized and the lien release to be signed and notarized. I also don't have instructions for who to send the lien release to. Will it be going to you or Mr. Dunn or will it be going to the escrow agent? I'll need specific instructions and a mailing address. Thanks.

-Alex

From: Adena Hodgins [mailto:adenahodgins@gmail.com]
Sent: Tuesday, June 03, 2014 9:12 AM
To: Fidis, Alexander
Subject: Fwd: FW: Hodgins

Hi Alex, I was wondering if you had gotten this on the payout? Also, we are on the 3rd closing extension, that will be the 10th, was just not wanting the buyer to get tired of waiting. Thanks Adena.

----- Forwarded message -----

From: Adena Hodgins <adenahodgins@gmail.com>
Date: Tue, May 27, 2014 at 4:17 PM
Subject: Re: FW: Hodgins
To: Bob Dunn <bdunn@dunnandblack.com>

After closing is 224,021.85, then after 50k is taken out the remainder is 174,021.85. So if they then are going to go 50%, that would be 87,010.92 for EPA and Estate. I did see that they had 100k, I just figured I must have misunderstood? Thanks Adena.

On Tue, May 27, 2014 at 11:25 AM, Bob Dunn <bdunn@dunnandblack.com> wrote:



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

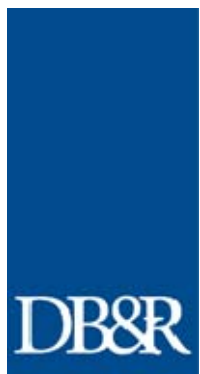
From: Fidis, Alexander [mailto:Fidis.Alexander@epa.gov]
Sent: Tuesday, May 27, 2014 10:04 AM
To: Bob Dunn
Subject: RE: Hodgins

Hi Bob –

I think you meant to send this email to Adena. The \$100k number was based on my understanding that the sale price was \$250k, your fees were 1/3 or \$83k (reduced to \$50k), and EPA and the estate were going to split the remainder. I didn't factor in closing or other costs. If these will affect the final payment please provide a summary of the costs and let me know what the correct number is. Thanks.

From: Bob Dunn [mailto:bdunn@dunnandblack.com]
Sent: Saturday, May 24, 2014 3:07 PM
To: Fidis, Alexander
Subject: RE: Hodgins

Adena—What is the net amount after closing costs etc.? This Agreement calls for payment to the EPA of \$100k and I thought the deal was 50% of the net proceeds after closing costs and the attorney fee. Do I have that wrong? Bob



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]

Sent: Thursday, May 22, 2014 4:23 PM

To: Bob Dunn

Cc: Adena Hodgins

Subject: RE: Hodgins

Bob –

Here's the agreement. Let me know if you have any questions. Otherwise please have it signed and returned. To expedite matters you can email me a scanned copy of the signature page. Once we have a signed copy I can have the lien release executed and mailed to you. I've also attached a final copy of the tolling agreement for your records.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Wednesday, May 21, 2014 12:09 PM
To: Fidis, Alexander
Cc: Adena Hodgins
Subject: RE: Hodgins

I look forward to receiving your draft. Bob



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Tuesday, May 20, 2014 3:45 PM
To: Maureen Obrien; Bob Dunn
Subject: RE: Hodgins

Bob –

I have a draft lien release agreement that is with management for review. EPA needs a signed agreement in order to legally accept payment and there were a few other legal issues I had to address that are fairly straightforward and hopefully won't be a problem. I drafted something simple that I hope to be able to share with you later today or tomorrow. I also drafted a lien release once the agreement is finalized. One question I had was who gets the copy of the recorded lien release? I typically list the property owner but given that there's a sale involved with an escrow agent I'm not sure what you need. If you can send me the name and address of the appropriate contact permit I'd appreciate it.

From: Maureen Obrien [<mailto:mobrien@dunnandblack.com>]
Sent: Monday, May 19, 2014 10:44 AM
To: Fidis, Alexander; Bob Dunn
Subject: RE: Hodgins

Good morning. Bob wanted me to forward you the attached. Thank you.

Maureen



Maureen Cox-O'Brien | Dunn Black &
Roberts, P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: mobrien@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Tuesday, May 13, 2014 4:38 PM
To: Bob Dunn
Cc: Maureen Obrien
Subject: RE: Hodgins

Bob –

The payment instruction depends on how payment is made. I've included payment by check and wire transfer. The most important instruction is to make sure you list the following information to make sure it's properly credited – see parentheses for the relevant information.

To ensure proper credit please include the following information on your payment:

- Company/remitter's name (Estate of Emory Stubblefield)
- Complete address, including city, state, zip (Personal Rep's contact info)
- Remitter's point of contact person and phone number (You or Personal Rep contact info)
- EPA document number (List as "Site ID # 10HD")
- EPA contact name and phone number, if available (Alex Fidis, Region 10 ORC, [206-553-4710](tel:206-553-4710))
- Reason for payment (State that it is for "lien release/cost recovery")

Check Payment by US postal:

U.S. Environmental Protection Agency

Cincinnati Finance Center

P.O. Box 979078

St. Louis, MO 63197-9000

Wire transfers through Fedwire:

Wire transfers to EPA can be done through the Federal Reserve Bank of New York using the following information:

ABA: 021030004

Account Number: 68010727

SWIFT address: FRNYUS33

33 Liberty Street

New York, NY 10045

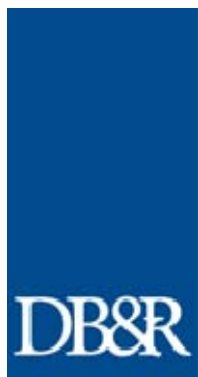
Field Tag 4200 of the Fedwire message should read: D 68010727 Environmental Protection Agency

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]

Sent: Tuesday, May 13, 2014 2:37 PM

To: Fidis, Alexander
Cc: Maureen Obrien
Subject: FW: Hodgins

Alex—this just in. Do you have info for me to pass along? Bob



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Maureen Obrien
Sent: Tuesday, May 13, 2014 2:23 PM
To: Bob Dunn
Subject: Hodgins

NW Title company out of walla walla has our order, and looking for “payout on the lien” information??? Do you know what she needs? Thanks.



Maureen Cox-O'Brien | Dunn Black &
Roberts, P.S.

111 N Post, Suite 300 | Spokane, WA 99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: mobrien@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Bob Dunn <bdunn@dunnandblack.com>
Sent: Tuesday, May 27, 2014 4:25 PM
To: Fidis, Alexander
Subject: FW: FW: Hodgins

Alex—Here are the figures you requested. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Adena Hodgins [mailto:████████████████████]
Sent: Tuesday, May 27, 2014 4:17 PM
To: Bob Dunn
Subject: Re: FW: Hodgins

After closing is 224,021.85, then after 50k is taken out the remainder is 174,021.85. So if they then are going to go 50%, that would be 87,010.92 for EPA and Estate. I did see that they had 100k, I just figured I must have misunderstood? Thanks Adena.

On Tue, May 27, 2014 at 11:25 AM, Bob Dunn <bdunn@dunnandblack.com> wrote:



Bob Dunn | Dunn Black & Roberts, P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [mailto:Fidis.Alexander@epa.gov]

Sent: Tuesday, May 27, 2014 10:04 AM

To: Bob Dunn

Subject: RE: Hodgins

Hi Bob –

I think you meant to send this email to Adena. The \$100k number was based on my understanding that the sale price was \$250k, your fees were 1/3 or \$83k (reduced to \$50k), and EPA and the estate were going to split the remainder. I didn't factor in closing or other costs. If these will affect the final payment please provide a summary of the costs and let me know what the correct number is. Thanks.

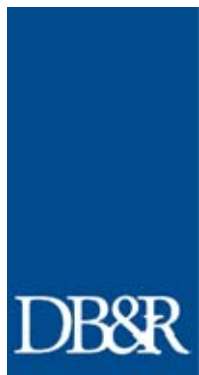
From: Bob Dunn [mailto:bdunn@dunnandblack.com]

Sent: Saturday, May 24, 2014 3:07 PM

To: Fidis, Alexander

Subject: RE: Hodgins

Adena—What is the net amount after closing costs etc.? This Agreement calls for payment to the EPA of \$100k and I thought the deal was 50% of the net proceeds after closing costs and the attorney fee. Do I have that wrong? Bob



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Thursday, May 22, 2014 4:23 PM
To: Bob Dunn

Cc: Adena Hodgins
Subject: RE: Hodgins

Bob –

Here's the agreement. Let me know if you have any questions. Otherwise please have it signed and returned. To expedite matters you can email me a scanned copy of the signature page. Once we have a signed copy I can have the lien release executed and mailed to you. I've also attached a final copy of the tolling agreement for your records.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Wednesday, May 21, 2014 12:09 PM
To: Fidis, Alexander
Cc: Adena Hodgins
Subject: RE: Hodgins

I look forward to receiving your draft. Bob



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Tuesday, May 20, 2014 3:45 PM
To: Maureen Obrien; Bob Dunn
Subject: RE: Hodgins

Bob –

I have a draft lien release agreement that is with management for review. EPA needs a signed agreement in order to legally accept payment and there were a few other legal issues I had to address that are fairly straightforward and hopefully won't be a problem. I drafted something simple that I hope to be able to share with you later today or tomorrow. I also drafted a lien release once the agreement is finalized. One question I had was who gets the copy of the recorded lien release? I typically list the property owner but given that there's a sale involved with an escrow agent I'm not sure what you need. If you can send me the name and address of the appropriate contact permit I'd appreciate it.

From: Maureen Obrien [<mailto:mobrien@dunnandblack.com>]
Sent: Monday, May 19, 2014 10:44 AM
To: Fidis, Alexander; Bob Dunn
Subject: RE: Hodgins

Good morning. Bob wanted me to forward you the attached. Thank you.

Maureen



Maureen Cox-O'Brien | Dunn Black & Roberts, P.S.

111 N Post, Suite 300 | Spokane, WA 99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: mobrien@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]

Sent: Tuesday, May 13, 2014 4:38 PM

To: Bob Dunn

Cc: Maureen Obrien

Subject: RE: Hodgins

Bob –

The payment instruction depends on how payment is made. I've included payment by check and wire transfer. The most important instruction is to make sure you list the following information to make sure it's properly credited – see parentheses for the relevant information.

To ensure proper credit please include the following information on your payment:

- Company/remitter's name (Estate of Emory Stubblefield)
- Complete address, including city, state, zip (Personal Rep's contact info)
- Remitter's point of contact person and phone number (You or Personal Rep contact info)
- EPA document number (List as "Site ID # 10HD")
- EPA contact name and phone number, if available (Alex Fidis, Region 10 ORC, [206-553-4710](tel:206-553-4710))

- Reason for payment (State that it is for “lien release/cost recovery”)

Check Payment by US postal:

U.S. Environmental Protection Agency

Cincinnati Finance Center

P.O. Box 979078

St. Louis, MO 63197-9000

Wire transfers through Fedwire:

Wire transfers to EPA can be done through the Federal Reserve Bank of New York using the following information:

ABA: 021030004

Account Number: 68010727

SWIFT address: FRNYUS33

33 Liberty Street

New York, NY 10045

Field Tag 4200 of the Fedwire message should read: D 68010727 Environmental Protection Agency

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]

Sent: Tuesday, May 13, 2014 2:37 PM

To: Fidis, Alexander

Cc: Maureen Obrien

Subject: FW: Hodgins

Alex—this just in. Do you have info for me to pass along? Bob



Bob Dunn | Dunn Black & Roberts,
P.S.

111 N Post, Suite 300 | Spokane, WA
99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: [\(509\) 455-8734](tel:(509)455-8734)

Email: bdunn@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Maureen Obrien
Sent: Tuesday, May 13, 2014 2:23 PM
To: Bob Dunn
Subject: Hodgins

NW Title company out of walla walla has our order, and looking for “payout on the lien” information??? Do you know what she needs? Thanks.



Maureen Cox-O'Brien | Dunn Black &
Roberts, P.S.

111 N Post, Suite 300 | Spokane, WA 99201

Tel: [\(509\) 455-8711](tel:(509)455-8711) | Fax: (509) 455-8734

Email: mobrien@dunnandblack.com

Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Maureen Obrien <mobrien@dunnandblack.com>
Sent: Monday, May 19, 2014 10:44 AM
To: Fidis, Alexander; Bob Dunn
Subject: RE: Hodgins
Attachments: HUD Settlement Statement - Seller's - 37374.pdf

Good morning. Bob wanted me to forward you the attached. Thank you.

Maureen



Maureen Cox-O'Brien | Dunn Black &
Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA 99201
Tel: (509) 455-8711 | Fax: (509) 455-8734
Email: mobrien@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [mailto:Fidis.Alexander@epa.gov]
Sent: Tuesday, May 13, 2014 4:38 PM
To: Bob Dunn
Cc: Maureen Obrien
Subject: RE: Hodgins

Bob –

The payment instruction depends on how payment is made. I've included payment by check and wire transfer. The most important instruction is to make sure you list the following information to make sure it's properly credited – see parentheticals for the relevant information.

To ensure proper credit please include the following information on your payment:

- Company/remitter's name (Estate of Emory Stubblefield)
- Complete address, including city, state, zip (Personal Rep's contact info)
- Remitter's point of contact person and phone number (You or Personal Rep contact infor)
- EPA document number (List as "Site ID # 10HD")
- EPA contact name and phone number, if available (Alex Fidis, Region 10 ORC, 206-553-4710)
- Reason for payment (State that it is for "lien release/cost recovery")

Check Payment by US postal:

U.S. Environmental Protection Agency

Cincinnati Finance Center
P.O. Box 979078
St. Louis, MO 63197-9000

Wire transfers through Fedwire:

Wire transfers to EPA can be done through the Federal Reserve Bank of New York using the following information:

ABA: 021030004

Account Number: 68010727

SWIFT address: FRNYUS33

33 Liberty Street

New York, NY 10045

Field Tag 4200 of the Fedwire message should read: D 68010727 Environmental Protection Agency

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]

Sent: Tuesday, May 13, 2014 2:37 PM

To: Fidis, Alexander

Cc: Maureen Obrien

Subject: FW: Hodgins

Alex—this just in. Do you have info for me to pass along? Bob



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Maureen Obrien

Sent: Tuesday, May 13, 2014 2:23 PM

To: Bob Dunn

Subject: Hodgins

NW Title company out of walla walla has our order, and looking for "payout on the lien" information??? Do you know what she needs? Thanks.



Maureen Cox-O'Brien | Dunn Black & Roberts,
P.S.
111 N Post, Suite 300 | Spokane, WA 99201
Tel: (509) 455-8711 | Fax: (509) 455-8734
Email: mobrien@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Bob Dunn <bdunn@dunnandblack.com>
Sent: Tuesday, May 13, 2014 2:37 PM
To: Fidis, Alexander
Cc: Maureen Obrien
Subject: FW: Hodgins

Alex—this just in. Do you have info for me to pass along? Bob



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Maureen Obrien
Sent: Tuesday, May 13, 2014 2:23 PM
To: Bob Dunn
Subject: Hodgins

NW Title company out of walla walla has our order, and looking for "payout on the lien" information??? Do you know what she needs? Thanks.



Maureen Cox-O'Brien | Dunn Black & Roberts,
P.S.
111 N Post, Suite 300 | Spokane, WA 99201
Tel: (509) 455-8711 | Fax: (509) 455-8734
Email: mobrien@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Maureen Obrien <mobrien@dunnandblack.com>
Sent: Monday, May 12, 2014 3:32 PM
To: Fidis, Alexander; Bob Dunn
Subject: RE: Stubblefield Site -Purchase offer
Attachments: Signature page to Tolling Agreement.pdf; Order Granting Mot for Court Ordered Authorization and Approval of Real Property Sale.pdf

Good afternoon – attached please find the signature page to the Tolling Agreement and the order signed by the Court approving sale. Thank you.

Maureen



Maureen Cox-O'Brien | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA 99201
Tel: (509) 455-8711 | Fax: (509) 455-8734
Email: mobrien@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [mailto:Fidis.Alexander@epa.gov]
Sent: Monday, May 12, 2014 8:39 AM
To: Bob Dunn
Cc: Adena Hodgins; Maureen Obrien
Subject: RE: Stubblefield Site -Purchase offer

Bob –

Thanks for the update, your summary sounds consistent with what we discussed. A stipulation instead of a formal settlement agreement works well for what we're proposing to do. I'll need to provide you with payment instructions to make sure the payment is properly credited. Let me know if there's anything I can do to assist.
-Alex

From: Bob Dunn [mailto:bdunn@dunnandblack.com]
Sent: Saturday, May 10, 2014 2:59 PM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen Obrien
Subject: RE: Stubblefield Site -Purchase offer

Alex—On Friday we had a hearing in this matter and the court granted my motion seeking court approval for the sale of the subject property on the basis of the written offer that I had previously provided to you. A conformed copy of the court order will be sent to you this next week. Closing of the property will proceed immediately. In that regard the tolling agreement that you had provided is acceptable and the Personal Representative –Adena Hodgins has signed it and I will forward that to you Monday as well. It also seems that we need a simple stipulated agreement concerning the

EPA's sharing in the sale proceeds as we discussed and agreed to in our earlier phone conversation and consistent with our exchange of emails on 3/24/2014. The anticipation is that the check to the EPA for its share would be cut the same day as the closing. Let me know if I have missed anything. Regards, Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Wednesday, April 23, 2014 4:09 PM
To: Bob Dunn
Subject: RE: Stubblefield Site -Purchase offer

Hi Bob –

As we discussed, I've attached a proposed tolling agreement to provide ample time to negotiate the sale of the Stubblefield Site and any other agreements related to the satisfaction of EPA's claims against the Emory Stubblefield Estate for cleanup costs. The tolled period is for one year starting on May 1. Let me know if you have any questions or comments on the agreement. Thanks.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Monday, March 24, 2014 10:24 AM
To: Fidis, Alexander
Subject: RE: Stubblefield Site -Purchase offer

Alex--3:30 tomorrow works. Bob



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Monday, March 24, 2014 9:17 AM
To: Bob Dunn
Cc: Adena Hodgins; Maureen O'Brien
Subject: RE: Stubblefield Site -Purchase offer

Bob –

EPA is willing to accept your client's offer to facilitate the sale of the Stubblefield property. I'm in meetings most of today but would like to set up a time to discuss the specifics. I'm free after 3:30 tomorrow, Thursday morning until noon and all day on Friday. Feel free to propose a day/time that works for you. Thanks.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Friday, March 07, 2014 10:04 AM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen O'Brien
Subject: FW: Stubblefield Site -Purchase offer

Alex—As discussed, attached is the only offer that remains on the Stubblefield parcel in Walla Walla, which as you know the Estate's Personal Representative-- Adena Hodgins has actively been trying to sell for some time now. The conditional offer is \$250k and requires EPA to release any lien that it may have on the Parcel. I became involved in representing the Estate in 1/2009 based on a 1/3 contingent fee agreement with everybody understanding that the Estate value exceeded \$3M but knowing that litigation was required to re-possess and secure the property from Emory's 3 estranged and disinherited adult children who we contend unlawfully moved back onto the property 1 month before Emory died. In fact litigation commenced and continues to date. In the meantime these three individuals "raped" assets of the Estate and have left millions unaccounted for. This parcel is about the last of the tangible assets available to address estate obligations. If the EPA agrees to this sale and the lien release, the PR's proposal for sharing the sale proceeds is a 50/50 split of the remaining funds after payment of my contingent fee, which in this case would be \$83k which I agree to discount to \$50k to likewise assist in facilitating this sale. I am aware that your client has standard release language that would have to be executed at closing but I do not see that as a troublesome impediment. Should you have any questions concerning this proposal feel free to call me. I look forward to your client's response. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Bob Dunn <bdunn@dunnandblack.com>
Sent: Saturday, May 10, 2014 2:59 PM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen Obrien
Subject: RE: Stubblefield Site -Purchase offer

Alex—On Friday we had a hearing in this matter and the court granted my motion seeking court approval for the sale of the subject property on the basis of the written offer that I had previously provided to you. A conformed copy of the court order will be sent to you this next week. Closing of the property will proceed immediately. In that regard the tolling agreement that you had provided is acceptable and the Personal Representative –Adena Hodgins has signed it and I will forward that to you Monday as well. It also seems that we need a simple stipulated agreement concerning the EPA's sharing in the sale proceeds as we discussed and agreed to in our earlier phone conversation and consistent with our exchange of emails on 3/24/2014. The anticipation is that the check to the EPA for its share would be cut the same day as the closing. Let me know if I have missed anything. Regards, Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Wednesday, April 23, 2014 4:09 PM
To: Bob Dunn
Subject: RE: Stubblefield Site -Purchase offer

Hi Bob –

As we discussed, I've attached a proposed tolling agreement to provide ample time to negotiate the sale of the Stubblefield Site and any other agreements related to the satisfaction of EPA's claims against the Emory Stubblefield Estate for cleanup costs. The tolled period is for one year starting on May 1. Let me know if you have any questions or comments on the agreement. Thanks.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Monday, March 24, 2014 10:24 AM

To: Fidis, Alexander
Subject: RE: Stubblefield Site -Purchase offer

Alex--3:30 tomorrow works. Bob



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Monday, March 24, 2014 9:17 AM
To: Bob Dunn
Cc: Adena Hodgins; Maureen O'Brien
Subject: RE: Stubblefield Site -Purchase offer

Bob –

EPA is willing to accept your client's offer to facilitate the sale of the Stubblefield property. I'm in meetings most of today but would like to set up a time to discuss the specifics. I'm free after 3:30 tomorrow, Thursday morning until noon and all day on Friday. Feel free to propose a day/time that works for you. Thanks.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Friday, March 07, 2014 10:04 AM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen O'Brien
Subject: FW: Stubblefield Site -Purchase offer

Alex—As discussed, attached is the only offer that remains on the Stubblefield parcel in Walla Walla, which as you know the Estate's Personal Representative-- Adena Hodgins has actively been trying to sell for some time now. The conditional offer is \$250k and requires EPA to release any lien that it may have on the Parcel. I became involved in representing the Estate in 1/2009 based on a 1/3 contingent fee agreement with everybody understanding that the Estate value exceeded \$3M but knowing that litigation was required to re-possess and secure the property from Emory's 3 estranged and disinherited adult children who we contend unlawfully moved back onto the property 1 month before Emory died. In fact litigation commenced and continues to date. In the meantime these three individuals "raped" assets of the Estate and have left millions unaccounted for. This parcel is about the last of the tangible assets available to address estate obligations. If the EPA agrees to this sale and the lien release, the PR's proposal for sharing the sale proceeds is a 50/50 split of the remaining funds after payment of my contingent fee, which in this case would be \$83k which I agree to discount to \$50k to likewise assist in facilitating this sale. I am aware that your client has standard release language that would have to be executed at closing but I do not see that as a troublesome impediment. Should

you have any questions concerning this proposal feel free to call me. I look forward to your client's response. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Bob Dunn <bdunn@dunnandblack.com>
Sent: Monday, March 24, 2014 10:24 AM
To: Fidis, Alexander
Subject: RE: Stubblefield Site -Purchase offer

Alex--3:30 tomorrow works. Bob



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Monday, March 24, 2014 9:17 AM
To: Bob Dunn
Cc: Adena Hodgins; Maureen Obrien
Subject: RE: Stubblefield Site -Purchase offer

Bob –

EPA is willing to accept your client's offer to facilitate the sale of the Stubblefield property. I'm in meetings most of today but would like to set up a time to discuss the specifics. I'm free after 3:30 tomorrow, Thursday morning until noon and all day on Friday. Feel free to propose a day/time that works for you. Thanks.

-Alex

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Friday, March 07, 2014 10:04 AM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen Obrien
Subject: FW: Stubblefield Site -Purchase offer

Alex—As discussed, attached is the only offer that remains on the Stubblefield parcel in Walla Walla, which as you know the Estate's Personal Representative-- Adena Hodgins has actively been trying to sell for some time now. The conditional offer is \$250k and requires EPA to release any lien that it may have on the Parcel. I became involved in representing the Estate in 1/2009 based on a 1/3 contingent fee agreement with everybody understanding that the Estate value exceeded \$3M but knowing that litigation was required to re-possess and secure the property from Emory's 3 estranged and disinherited adult children who we contend unlawfully moved back onto the property 1 month before Emory died. In fact litigation commenced and continues to date. In the meantime these three individuals "raped"

assets of the Estate and have left millions unaccounted for. This parcel is about the last of the tangible assets available to address estate obligations. If the EPA agrees to this sale and the lien release, the PR's proposal for sharing the sale proceeds is a 50/50 split of the remaining funds after payment of my contingent fee, which in this case would be \$83k which I agree to discount to \$50k to likewise assist in facilitating this sale. I am aware that your client has standard release language that would have to be executed at closing but I do not see that as a troublesome impediment. Should you have any questions concerning this proposal feel free to call me. I look forward to your client's response. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Bob Dunn <bdunn@dunnandblack.com>
Sent: Saturday, March 08, 2014 9:16 AM
To: Fidis, Alexander
Subject: RE: Stubblefield Site -Purchase offer

Yes, we still intend to pursue these 3 and in fact have a small judgment (\$115k) against Albert Stubblefield which we will be moving to foreclose upon shortly. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Friday, March 07, 2014 4:30 PM
To: Bob Dunn
Subject: RE: Stubblefield Site -Purchase offer

Thanks Bob. I'll discuss this offer with my client and get back to you. One question for you, does the estate have plans to pursue the Stubblefield children to recovery assets or is that not a viable option?

From: Bob Dunn [<mailto:bdunn@dunnandblack.com>]
Sent: Friday, March 07, 2014 10:04 AM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen Obrien
Subject: FW: Stubblefield Site -Purchase offer

Alex—As discussed, attached is the only offer that remains on the Stubblefield parcel in Walla Walla, which as you know the Estate's Personal Representative-- Adena Hodgins has actively been trying to sell for some time now. The conditional offer is \$250k and requires EPA to release any lien that it may have on the Parcel. I became involved in representing the Estate in 1/2009 based on a 1/3 contingent fee agreement with everybody understanding that the Estate value exceeded \$3M but knowing that litigation was required to re-possess and secure the property from Emory's 3 estranged and disinherited adult children who we contend unlawfully moved back onto the property 1 month before Emory died. In fact litigation commenced and continues to date. In the meantime these three individuals "raped" assets of the Estate and have left millions unaccounted for. This parcel is about the last of the tangible assets available to address estate obligations. If the EPA agrees to this sale and the lien release, the PR's proposal for sharing the sale proceeds is a 50/50 split of the remaining funds after payment of my contingent fee, which in this case would be \$83k

which I agree to discount to \$50k to likewise assist in facilitating this sale. I am aware that your client has standard release language that would have to be executed at closing but I do not see that as a troublesome impediment. Should you have any questions concerning this proposal feel free to call me. I look forward to your client's response. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Bob Dunn <bdunn@dunnandblack.com>
Sent: Friday, March 07, 2014 10:04 AM
To: Fidis, Alexander
Cc: Adena Hodgins; Maureen Obrien
Subject: FW: Stubblefield Site -Purchase offer
Attachments: doc13995420140307094021.pdf

Alex—As discussed, attached is the only offer that remains on the Stubblefield parcel in Walla Walla, which as you know the Estate's Personal Representative-- Adena Hodgins has actively been trying to sell for some time now. The conditional offer is \$250k and requires EPA to release any lien that it may have on the Parcel. I became involved in representing the Estate in 1/2009 based on a 1/3 contingent fee agreement with everybody understanding that the Estate value exceeded \$3M but knowing that litigation was required to re-possess and secure the property from Emory's 3 estranged and disinherited adult children who we contend unlawfully moved back onto the property 1 month before Emory died. In fact litigation commenced and continues to date. In the meantime these three individuals "raped" assets of the Estate and have left millions unaccounted for. This parcel is about the last of the tangible assets available to address estate obligations. If the EPA agrees to this sale and the lien release, the PR's proposal for sharing the sale proceeds is a 50/50 split of the remaining funds after payment of my contingent fee, which in this case would be \$83k which I agree to discount to \$50k to likewise assist in facilitating this sale. I am aware that your client has standard release language that would have to be executed at closing but I do not see that as a troublesome impediment. Should you have any questions concerning this proposal feel free to call me. I look forward to your client's response. Bob Dunn



Bob Dunn | Dunn Black & Roberts, P.S.
111 N Post, Suite 300 | Spokane, WA
99201
Tel: (509) 455-8711 | Fax: (509) 455-
8734
Email: bdunn@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

Fidis, Alexander

From: Maureen Obrien <mobrien@dunnandblack.com>
Sent: Wednesday, February 26, 2014 11:50 AM
To: Bob Dunn; Fidis, Alexander
Subject: RE: Stubblefield Salvage -- Ecology Contact

Good morning. Mr. Dunn asked that I provide you with some of the addresses I have had from Albert Stubblefield, Lenora Thompson and Lily Shoop. The following is what I have had previously:

Albert Stubblefield

[REDACTED]

Al Stubblefield

[REDACTED]

Lenora Thompson

Lily Shoop

[REDACTED]

Al Stubblefield's former Maryland address:

[REDACTED]

This was an address we had for Al and Lenora, however, it has been returned undeliverable before.

Al Stubblefield

[REDACTED]

Lenora Thompson

[REDACTED]

Thank you. Maureen



Maureen Cox-O'Brien | Dunn Black & Roberts,
P.S.
111 N Post, Suite 300 | Spokane, WA 99201
Tel: (509) 455-8711 | Fax: (509) 455-8734
Email: mobrien@dunnandblack.com
Website: www.DunnandBlack.com

Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

From: Fidis, Alexander [<mailto:Fidis.Alexander@epa.gov>]
Sent: Wednesday, February 19, 2014 2:33 PM
To: Bob Dunn
Subject: Stubblefield Salvage -- Ecology Contact

Bob –

Nice talking with you today. As discussed, EPA has completed our planned removal actions and Ecology is currently the lead agency for future decisions concerning the Stubblefield Site. You can access our removal completion report and other site documents at the following: http://www.epaosc.org/site/doc_list.aspx?site_id=5508

The Ecology contact for Stubblefield is:

Virginia (Ginny) Darrell, PE, MOL ~ Site Management Unit Supervisor,
Toxics Cleanup Program, 509-329-3431 Dept. of Ecology - Eastern Regional Office, 4601 N. Monroe,
Spokane, WA 99205

If you have any questions feel free to contact me.

Alex Fidis
Assistant Regional Counsel
206-553-4710